

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of)	
)	
Implementation of Section 304 of the)	CS Docket No 97-80
Telecommunications Act of 1996)	
)	
Commercial Availability of Navigation)	
Devices)	
)	PP Docket No. 00-67
Compatibility Between Cable Systems)	
and Consumer Electronics Equipment)	
)	

To: The Commission

MOTION FOR EXTENSION OF TIME TO FILE COMMENTS

The American Antitrust Institute (“AAI”), by its attorney, hereby requests that the Commission extend the Comment due date to the *Second Further Notice of Proposed Rulemaking* (“*2dFNPRM*”) in the above-captioned proceeding for 60 days, or until March 15, 2004. Such an extension is warranted because of a substantial overlap between the issues raised in the *2dFNPRM* and the issues raised in the ongoing *Digital Broadcast Content Protection* proceeding.¹ Among the issues raised in that proceeding is whether rules relating to digital broadcast content protection and measures applicable to non-broadcast video distribution should be determined under

¹*Digital Broadcast Content Protection, Report and Order and Further Notice of Proposed Rulemaking*, MB Docket 02-230, FCC No. 03-273 (rel. Nov. 4, 2003).

a unified regime. By facilitating the joint consideration of the overlapping policy and business issues in both proceedings, the requested extension of time will provide the time necessary to investigate the merits of a unified regime and the effects of such a regime (or lack thereof) on inter-modal competition for the delivery of video services. Comments in the *Digital Broadcast Content Protection* docket are also due on January 14, 2004, and AAI has filed contemporaneously herewith a Motion for Extension of Time for an additional 60 days therein.

WHEREFORE, AAI respectfully requests and additional 60 days, to March 15, 2004, for all parties to file Comments in this proceeding.

Respectfully submitted,

AMERICAN ANTITRUST INSTITUTE

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By: /s/
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